

# EXHIBIT 2

**From:** Nicole M. Uhlendorff <[nmu@connorsllp.com](mailto:nmu@connorsllp.com)>  
**Sent:** Wednesday, March 20, 2024 1:06 PM  
**To:** Andrew M. Debbins <[amd@connorsllp.com](mailto:amd@connorsllp.com)>; Timothy D. Elliott <[TElliott@rathjelaw.com](mailto:TElliott@rathjelaw.com)>; Emily Shupe <[eshupe@rathjelaw.com](mailto:eshupe@rathjelaw.com)>  
**Cc:** Terrence M. Connors <[tmc@connorsllp.com](mailto:tmc@connorsllp.com)>  
**Subject:** FW: CFPB et al v. SFS et al.

**Nicole M. Uhlendorff | Legal Assistant**  
[nmu@connorsllp.com](mailto:nmu@connorsllp.com)

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Note: This e-mail may contain privileged or confidential information.

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**From:** Thoman, James C. <[JThoman@hodgsonruss.com](mailto:JThoman@hodgsonruss.com)>  
**Sent:** Wednesday, March 20, 2024 2:03 PM  
**To:** Terrence M. Connors <[tmc@connorsllp.com](mailto:tmc@connorsllp.com)>  
**Cc:** Nicole M. Uhlendorff <[nmu@connorsllp.com](mailto:nmu@connorsllp.com)>; Thomas McNamara <[tmcnamara@mcnamarallp.com](mailto:tmcnamara@mcnamarallp.com)>; Heftka, Michelle A. <[MHeftka@hodgsonruss.com](mailto:MHeftka@hodgsonruss.com)>  
**Subject:** RE: CFPB et al v. SFS et al.

Dear Terry, please provide us copies of the documents related to the Intervening Law Firms' claims against the Policy.

The Receiver objects to the Intervening Law Firms assertion of claims against the policy as a violation of the Stay imposed by both the TRO and the PI issued by the Court on March 4, 2024. Except by leave of Court, the Intervening Law Firms are stayed from taking any action to enforce any claim against an "Asset" (as defined in the PI) of the Receivership Defendants. The Policy is an Asset of the Receivership Defendants. The Intervening Law Firms attempt to recover from the Assets of the Receivership Defendants is clearly prohibited by the terms of the PI. We request that you immediately withdraw your claim against the Policy until such time as the Court can consider your application to modify the stay.

Thank you.

Jim

**James C. Thoman**  
Partner  
Hodgson Russ LLP

**Tel:** 716.848.1361

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**From:** Terrence M. Connors <[tmc@connorsllp.com](mailto:tmc@connorsllp.com)>

**Sent:** Saturday, March 16, 2024 1:54 PM

**To:** Thoman, James C. <[JThoman@hodgsonruss.com](mailto:JThoman@hodgsonruss.com)>

**Cc:** Nicole M. Uhendorff <[nmu@connorsllp.com](mailto:nmu@connorsllp.com)>

**Subject:** CFPB et al v. SFS et al.

External Email - Use Caution

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Dear Jim,

As I am sure you are aware, there is an insurance policy through Cell Gramercy 2 of Contego Insurance, Inc. that provides insurance coverage for indemnification and contribution obligations of StratFS, LLC subsidiaries (the “Strategic Entities”) for Claims (as that term is defined in the policy) in connection with the relevant servicing agreements between the Strategic Entities and the relevant Intervening Law Firms (Policy No. GRA300202401258, and hereinafter the “Policy”). The Intervening Law Firms are listed as insureds under that Policy.

Please be advised that on March 15, 2024, certain of the Intervening Law Firms have made claims against the Policy. We believe those are valid claims that should be promptly processed and paid in the normal course. We are placing you on notice with respect to the filing of these claims. If you object to the processing or payment of these claims from the insurance proceeds, please let us know at your earliest convenience (and, in no event later than Friday, March 22) so that we may bring this

issue to the Court's attention.

Best, Terry

Have you had a chance to respond to my March 11 correspondence? Please advise.



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